



GARY R. HERBERT  
*Governor*

SPENCER J. COX  
*Lieutenant Governor*

State of Utah  
DEPARTMENT OF COMMERCE  
Office of Consumer Services

MICHELE BECK  
Director

To: Public Service Commission of Utah

From: Office of Consumer Services  
Michele Beck, Director  
Cheryl Murray, Utility Analyst

Date: January 5, 2018

Subject: Rocky Mountain Power's Proposed Housekeeping Tariff Revisions  
- Docket No. 17-035-T15

On December 21, 2017, Rocky Mountain Power (Company) filed with the Public Service Commission of Utah (Commission) proposed tariff sheets updating Schedules 2E, 31, 32, 73, 121 and 135. The Company requested an effective date of January 22, 2018 for the changes.

On December 22, 2017 the Commission issued a Notice of Filing and Comment Period notifying interested parties that comments on the proposed tariff revisions could be submitted to the Commission on or before Friday, January 5, 2018 and reply comments on or before Thursday, January 11, 2018.

### Office Comments

In its filing the Company explains that the proposed changes are to update Schedules 2E, 31, 32, 73 and 121 "to exclude co-participation of those programs and the Transition Program for Customer Generators (Schedule 136)". Currently, each of those tariffs include an exclusion for participation in Schedule 135, the net metering program. Adding an exclusion for participation in Schedule 136, also a customer generator program, is necessary to adhere to the intent of the current language, that is, excluding participation in those programs in conjunction with another program for customer generators.

The Office concurs with the Company's assessment on this issue and recommends that the Commission approve the requested language addition.

The Company also proposes a change to Schedule 135 to add further specificity to the definition of Annualized Billing Period to differentiate the definition for irrigation customers on Electric Service Schedule 10.

The Office of Consumer Services (Office) recommended this additional language in our comments filed in Docket No. 14-035-114 on November 8, 2017 with a further explanation offered, as requested by the Commission, in our Additional Comments filed on December 12, 2017. Although the Company rejected the recommendation initially, in its December 12, 2017 comments the Company agreed to add the suggested language.

The Office continues to believe that this is a necessary change and recommends that the Commission approve the Company's request to modify Schedule 135 with additional Annualized Billing Period language specific to irrigation customers.

### **Summary of Office Recommendations**

The Office recommends that the Commission approve the Company's requested tariff changes with an effective date of January 22, 2018.